

To: Allen, Elizabeth[allen.elizabeth@epa.gov]; Christopher, Anne[Christopher.Anne@epa.gov]; Conley, Alanna[conley.alanna@epa.gov]; Cora, Lori[Cora.Lori@epa.gov]; Robinson, Deborah[Robinson.Deborah@epa.gov]; Ebright, Stephanie[EBRIGHT.STEPHANIE@EPA.GOV]; DeMaria, Eva[DeMaria.Eva@epa.gov]; Koch, Kristine[Koch.Kristine@epa.gov]
Cc: Zhen, Davis[Zhen.Davis@epa.gov]
From: Sheldrake, Sean
Sent: Wed 11/4/2015 11:37:10 PM
Subject: FW: Five Tribes Review of RM11E Draft Implementability Study Report

Fyi all. S

Sean Sheldrake, Unit Diving Officer, RPM

EPA Region 10, 1200 Sixth Ave., Suite 900; Mailstop DOC-01

Seattle, WA 98101

206.553.1220 desk

206.225.6528 cell

<http://yosemite.epa.gov/r10/cleanup.nsf/sites/ptldharbor>

<http://www.epa.gov/region10/dive/>

206.553.6379 Dive Operations Center

206.369.7500 Dive Unit cell

Like us on Facebook! <https://www.facebook.com/EPADivers>

From: Sheldrake, Sean

Sent: Wednesday, November 04, 2015 3:36 PM

To: Rita Cabral <RCabral@indecon.com>

Cc: 'Julie Weis' <JWeis@hk-law.com>; Michael.karnosh@grandronde.org; brandy.humphreys@grandronde.org; 'Holly Partridge' <Holly.Partridge@grandronde.org>; tom.d@ctsi.nsn.us; 'cunninghame@gorge.net' <cunninghame@gorge.net>; 'Elmer Ward - Confederated Tribes of the Warm Springs Reservation of Oregon (elmer.ward@ctwsbnr.org) (elmer.ward@ctwsbnr.org)' <elmer.ward@ctwsbnr.org>; 'courtney@crag.org' <courtney@crag.org>; 'Gabriel Moses' (

Personal Privacy / Ex. 6

Personal Privacy / Ex. 6

Rachel DelVecchio <RDelVecchio@indecon.com>; Gail Fricano <GFricano@indecon.com>; Tom Fredette

Personal Privacy / Ex. 6

Personal Privacy / Ex. 6

Subject: RE: Five Tribes Review of RM11E Draft Implementability Study Report

Hello Rita,

Some of the comments from the Five Tribes on the RM11E Implementability Study Report were not incorporated into the comment set in development. Below are the comments and the rational for exclusion.

Please let me know if you have any questions—happy to talk further before we finalize our comment set if you like, just let me know.

Thank you.

S

Comment #6

During the discussion of past dredging events, the extent of contamination was not discussed. Past dredging events could provide valuable information related to the distribution of contaminants at the site, particularly with regard to generated residuals. If contaminant sampling had not been done in relationship to these dredge events then it should be clearly stated that this is why contaminant concentrations related to past dredging event are not discussed. Otherwise, we suggest including discussion of contaminant concentrations related to these events.

Rational for exclusion:

This comment refers to Section 3.6.3 of the ISR which discusses anecdotal Willamette River dredging information including physical characteristics of the river bed. Contaminant data associated with the dredging operations is in the Portland Harbor data base but is limited and has been superseded by the extensive sediment data collected as part of the RM11E and Portland Harbor RI/FS activities.

Comment #7

It is unclear why the anthropogenic armoring described in Section 4.3.1 is not evaluated in this report. The ISR is meant to identify and assess site constraints that will need to be considered and addressed as part of the remedial design for the RM11E project area. The anthropogenic armoring was identified, but not evaluated. We suggest evaluating the limitations this armoring would have on a remedy.

Rational for exclusion:

The ISR notes that anthropogenic armoring “should be evaluated and incorporated into remedial actions once the extent of cleanup areas have been finalized.” The PH FS does not consider bank armoring as part of the technology assignment process; therefore, EPA does not have an expectation that armoring will be remediated but will have to be considered in the evaluation as indicated in this section of the report.

Comment #10

We suggest reducing the ambiguity in Section 5.3.1 regarding what is shoreline slope and what is riverbank. Currently, slope is used for describing both subaerial and subaqueous slopes, which creates confusion when discussing how the slope is armored (e.g., with vegetation). Please use consistent language when describing subaerial and subaqueous slopes in this section.

Rational for exclusion:

EPA considers this comment to be editorial; therefore, no revision is necessary.

Sean Sheldrake, Unit Diving Officer, RPM

EPA Region 10, 1200 Sixth Ave., Suite 900; Mailstop DOC-01

Seattle, WA 98101

206.553.1220 desk

206.225.6528 cell

<http://yosemite.epa.gov/r10/cleanup.nsf/sites/ptldharbor>

<http://www.epa.gov/region10/dive/>

206.553.6379 Dive Operations Center

206.369.7500 Dive Unit cell

Like us on Facebook! <https://www.facebook.com/EPADivers>

From: Sheldrake, Sean [<mailto:sheldrake.sean@epa.gov>]

Sent: Friday, September 18, 2015 9:46 AM

To: Rita Cabral <RCabral@indecon.com>

Cc: 'Julie Weis' <JWeis@hk-law.com>; Michael.karnosh@grandronde.org;
brandy.humphreys@grandronde.org; 'Holly Partridge' <Holly.Partridge@grandronde.org>;
tomd@ctsi.nsn.us; 'cunninghame@gorge.net' <cunninghame@gorge.net>; 'Elmer Ward -
Confederated Tribes of the Warm Springs Reservation of Oregon (elmer.ward@ctwsbnr.org)
(elmer.ward@ctwsbnr.org)' <elmer.ward@ctwsbnr.org>; 'courtney@crag.org'
<courtney@crag.org>; 'Gabriel Moses' [Personal Privacy / Ex. 6]
<[Personal Privacy / Ex. 6]> Rachel DelVecchio <RDelVecchio@indecon.com>; Gail
Fricano <GFricano@indecon.com>; Tom Fredette ([Personal Privacy / Ex. 6]
[Personal Privacy / Ex. 6])

Subject: RE: Five Tribes Review of RM11E Draft Implementability Study Report

Rita,

Thank you for the Tribes' comments. We'll incorporate into our comment set or get back with you to discuss further.

Thank you.

S

Sean Sheldrake, Unit Diving Officer, RPM

EPA Region 10, 1200 Sixth Ave., Suite 900; Mailstop DOC-01

Seattle, WA 98101

206.553.1220 desk

206.225.6528 cell

<http://yosemite.epa.gov/r10/cleanup.nsf/sites/ptldharbor>

<http://www.epa.gov/region10/dive/>

206.553.6379 Dive Operations Center

206.369.7500 Dive Unit cell

Like us on Facebook! <https://www.facebook.com/EPADivers>

From: Rita Cabral [<mailto:RCabral@indecon.com>]

Sent: Monday, September 14, 2015 2:06 PM

To: Sheldrake, Sean

Cc: 'Julie Weis'; Michael.karnosh@grandronde.org; brandy.humphreys@grandronde.org; 'Holly Partridge'; tomd@ctsi.nsn.us; 'cunninghame@gorge.net'; 'Elmer Ward - Confederated Tribes of the Warm Springs Reservation of Oregon (elmer.ward@ctwsbnr.org)' (elmer.ward@ctwsbnr.org); 'courtney@crag.org'; 'Gabriel Moses

Personal Privacy / Ex. 6

Rachel DelVecchio; Gail Fricano; Tom Fredette

Personal Privacy / Ex. 6

Subject: Five Tribes Review of RM11E Draft Implementability Study Report

Hello Sean,

Thank you for the opportunity to comment on the RM11E Draft Implementability Study Report. Attached are comments on behalf of the Five Tribes. Please let me know if you have any questions or would like to set up a call to discuss the comments.

Best regards,

Rita

Rita Cabral, Ph.D.

Associate

Industrial Economics, Incorporated (IEc)
2067 Massachusetts Ave.
Cambridge, MA 02140

617.354.0074

www.indecon.com